

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE:

ANDRE BURDINE-COLLINS
DAVID D. COLLINS

CASE NO. 19-52462

CHAPTER 13

DEBTOR

JUDGE JOHN E. HOFFMAN JR.

OBJECTION TO CONFIRMATION

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes now Faye D. English, Chapter 13 Trustee and objects to confirmation of the plan and would show this Court that in the above-referenced case the Court should enter an order denying confirmation for the reasons set forth below and dismissing the case pursuant to 11 USC §1307(c) for the following:

- The Chapter 13 Statement of Financial Affairs, Plan, Means Test, or Schedules must be amended to reflect the changes in the following areas: The proposed pot is inadequate to fund the plan, secured creditors will not be paid in full and unsecured creditors will not receive the 2% minimum dividend. Per the 341 testimony, the Plan does not provide treatment for pre-petition mortgage arrears. Plan does not provide for a step in payment once loan repayment ends. Plan payment is not enough to cover all monthly payments, attorney fees, and trustee fees.
- Payments due pursuant to U.S.C. § 1326 (a)(1) and § 1325 (a)(2) have not been made. Remainder of first payment needed.
- Clarification needed on property taxes and homeowners insurance.

Wherefore, the Trustee prays the Court deny confirmation for the reasons set forth and the case be dismissed or converted to Chapter 7, whichever shall be determined in the creditor's best interest.

Dated: 6/3/2019

Respectfully submitted,

/s/ Faye D. English

Faye D. English
Chapter 13 Trustee
One Columbus
10 West Broad St., Suite 900
Columbus, OH 43215-3449
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Objection To Confirmation was served (i) **electronically** on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and (ii) by **ordinary U.S. Mail** on 6/3/2019 addressed to:

Andre Burdine-Collins
David D. Collins
1505 E. 24Th Ave.
Columbus, Oh 43211

/s/ Faye D. English
Faye D. English (0075557), Chapter 13 Trustee